

Samuel T. Poole

: Civil Action No.99-635

v.

: Judge *Sue L. Robinson*

Stan Taylor and Raphael Williams

ORIGINAL**FILED**

OCT 13 2005

U.S. DISTRICT COURT
DISTRICT OF DELAWARE**Plaintiff's Request for Production of Documents**

Pursuant to Rule 34, fed.R. Civ P., the plaintiff requests that the defendants produce the documents-listed herein within 30 days either by providing the plaintiff with copies or by making them available to the plaintiff for inspection and copying.

1. Any and all suits filed against the state for placing inmates on the floor followed by any of Complaints in the state at the other three prisons Symerna and Georgetown and Gander Hill.
2. A total of all inmates that was being held in all your prisons total capacity each seperated Symerna, Georgetown, Gander Hill.
3. I want to see when that prison was open and when it was single and then you doubled and tripled, with everything that was done to approve this and by whom this was done and the build coders and who approved this.
4. I want all Complaints that was filed about how cold it was during the winter month and summer about how cold it was sleeping on the floor and in the cell.
5. All medical Records containing to the July 6, 1999, incident report filed by everybody and even Medical Staff and Guards.
6. I want to see all reports containing to you at Gander Hill fixing that sink 1 year before and approximately 6 months after, with Grievance filed.
7. I want to see how sentenced inmates was charged and sentence was kept in 2 man cell at Gander Hill.
8. I want to see all complaints entered and all the people came to that building to check on the Fitness Center with how many inmates that was kept in the gym.
9. I want to see the license of the Dr. you had stitch me up on July 6, 1999, and all suits filed against Gander Hill (Mal Practice) for the same Dr.
10. I want all Grievances that was filed about the heat and how cold it was on the first floor all complaints and repairs entered and fixed.

11. I want to know all maintenance problems with the Heating System on the first floor.
12. I want to know during this time kept in the cell at approx. 106% while bleeding. I want to know what the problems why inmates were kept in 106% to where repair only on the inmates section and in the hallways and in the Guards booth it was freezing. I want to see all repairs and complaints to get that air conditioner repaired.
13. Witness all staff working on 1-2 shift that had contact with the inmates and the nurses from July 6, 1999 and Dr.

10-9-05

C.C. Richard W. Hubbard
2 cop 10/10/05



Samuel T. Poole BN-5599

P.O. Box 1000

Houtzdale, PA 16698-1000

From Dick

4 copies

AFFIDAVIT AND PROOF OF SERVICE

NOW COMES, *Samuel T. Roke* AND AFIRMS THAT HE IS THE LITIGANT IN THE AFORE CAPTIONED AND ATTACHED MATTER, THAT THE WITHIN AVERMENTS AND FACTS IN SUPPORT THEREFORE ARE TRUE AND CORRECT TO THE BEST OF HIS PERSONAL EXPERIENCE, RECALL, KNOWLEDGE AND BELIEF, UNDER PENALTY FOR PERJURY. HE FURTHER AFFIRMS AND AVERS THAT HE HAS SERVED COPIES OF THE FOREGOING AND ATTACHED DOCUMENTS BY FIRST-CLASS MAIL TO THE PARTIES LISTED BELOW, BY HAVING PLACED THEM IN THE HANDS OF PRISON AUTHORITIES FOR MAILING, AS RULED PROPERLY AND TIMELY "FILED" BY AND IN HOUSTON vs LACK, 108 s. ct 2379, at 2383 (1988).

I CERTIFY THAT THIS DOCUMENT WAS GIVEN TO PRISON OFFICIALS, FOR THE FORWARDING TO THE SAID COURT. I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. 28 U.S.C. SEC. 1746.

BY AFFIANT:

[Signature]

CC:

SUBSCRIBED AND SWORN TO ME

THIS 9 DAY OF 10, 2001

*Sending Motion for Discovery and Interrogatories
To: Certified*

2 Copies

*Richard W. Hubbard
820 N. French St
Wiln, DC*

1980+

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